IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

SEGMENT CONSULTING MANAGEMENT, LTD., a British Columbia, Canada Company; and LIGHTHOUSE ENTERPRISES INC., a Barbados Company,

Plaintiffs,

v.

BLISS NUTRACETICALS LLC, a Georgia Limited Liability Company; VIVAZEN BOTANICALS LLC, a Florida Limited Liability Company; and DOES 1 through 10,

Defendants.

CIVIL ACTION

FILE NO: 1:20-cv-01837-CAP

JURY DEMAND

MOTION FOR EXPEDITED CONSIDERATION AND IMMEDIATE ORDER ON PLAINTIFFS' *EX PARTE* MOTION FOR TEMPORARY RESTRAINING ORDER

COME NOW Plaintiffs Segment Consulting Management, Ltd. ("Segment"), and Lighthouse Enterprises Inc. ("Lighthouse") (collectively, "Plaintiffs"), and pursuant to Local Rules 7.4, 7.5(A) and 65.1, respectfully move this Honorable Court for expedited consideration and an immediate Order on Plaintiffs' *Ex Parte* Motion for Temporary Restraining Order, filed with the Court on April 29, 2020.

(Dkt. 5, 5-1, and 5-2). Expedited consideration is warranted, as detailed in Plaintiffs'

Motion and Memorandum in Support Thereof, because Plaintiffs have demonstrated

"(1) a substantial likelihood of success on the merits of the underlying case; (2) [that

Plaintiffs] will suffer irreparable harm in the absence of an injunction; (3) a harm

suffered by [Plaintiffs] in the absence of an injunction would exceed the harm

suffered by the opposing party if the injunction issued, and (4) an injunction would

not disserve the public interest." N. Am. Med. Corp. v. Axiom Worldwide, Inc., 522

F.3d 1211, 1217 (11th Cir. 2008). Plaintiffs hereby incorporate and adopt the

arguments and citations to authority contained in Plaintiffs' Ex Parte Motion for

Temporary Restraining Order and Memorandum in Support Thereof, as though fully

set forth herein. (See Dkt. 5, 5-1, and 5-2).

WHEREFORE, Plaintiffs pray for expedited consideration and an immediate

Order GRANTING their *Ex Parte* Motion for Temporary Restraining Order.

Respectfully submitted this 14th day of May, 2020.

HALL BOOTH SMITH, P.C.

/s/ Samuel S. Sykes II

John E. Hall, Jr.

Georgia Bar No. 319090

Samuel S. Sykes II

Georgia Bar No. 227548

Attorneys for Plaintiffs

191 Peachtree Street, NE, Suite 2900 Atlanta, Georgia 30303

Phone: (404) 954-5000

Fax (404) 954-5020

jhall@hallboothsmith.com

ssykes@hallboothsmith.com

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STRONG & HANNI

102 South 200 East Suite 800 Salt Lake City, Utah 84111 Phone (801) 531-7080 Fax (801) 596-1508 bjohnson@strongandhanni.com syoung@strongandhanni.cm /s/ Spencer W. Young
Brian C. Johnson
Utah Bar No. 3936
Spencer W. Young
Utah Bar No. 16993
[Admitted Pro Hac Vice]

Attorneys for Plaintiff